

JAN 26 2010



CANDLEWOOD VALLEY CHAPTER  
P.O. Box 3795, Danbury, CT 06810



Mr. Paul E. Stacey  
Department of Environmental Protection  
Bureau of Water Protection and Land Reuse  
Planning and Standards Division  
79 Elm Street  
Hartford, CT 06106-5127

Re: Support for revised stream flow standards

Dear Mr. Stacey:

The Candlewood Valley Chapter of Trout Unlimited (CVTU) supports DEP's efforts to revise stream flow standards. You have taken the time to craft a truly workable framework to set standards on all Connecticut's waterways. We point specifically to these positive provisions:

1. The necessary work of classification of streams will be a thoughtful and public process
2. New standards will be phased in, giving all involved time to adjust to changes
3. The several exemptions included recognize the realities of water management
4. The drought and flood triggers and the procedure to apply for variances provides great flexibility
5. The option of adopting a Flow Management Plan as an alternative to specific requirements adds even more flexibility.
6. No conflict will occur with existing flow management plans or with FERC approved plans.

We are also pleased that these revised standards address groundwater withdrawals. The majority of our suburban and rural residents depend on groundwater because Connecticut law presently prohibits drinking water to be taken from surface water systems, such as our lakes and larger rivers, that receive certain discharges. That puts enormous pressure on ground water reserves and on those few clear streams that receive no discharges and which often support wild trout.

But there are areas where the proposed regulations should be strengthened, particularly when it comes to urban rivers which will likely be designated as Class 4 rivers.

It is my understanding that such a classification will remove all of the stream flow protections from such rivers, severely limiting any chance that such streams can remain viable habitat for trout.

Just as the proposed regulations recognize that a one-size fits all approach is not the best solution and encourage individual flow management plans, they must also recognize that all urban rivers are not the same, and that even degraded rivers can be rehabilitated and restored. I encourage you to put in place

minimum standards, or a sliding scale within the Class 4 designation that would ensure the river's current health and level of aquatic life is sustained while measures are taken to improve the habitat further.

As an active and involved Trout Unlimited member, I know that restoration efforts can be successful at improving rivers throughout the state. I know that there is a strong desire to protect our rivers and a will to work together, as conservationists, to work to restore them.

Please allow us the opportunity to make such improvements in our urban streams. Class 4 rivers can be brought back, but we need the water flows to be there to sustain the current level of life and allow for upstream passage once we have improved the habitat.

In closing, the Proposed Stream Flow Standards and Regulations represent an important step in ensuring an abundant supply of water for human use while protecting the ecological needs and recreational enjoyment of Connecticut's rivers and streams.

Balancing these needs is a difficult task, and the proposed regulations admirably create a standard that accounts for that balance.

I would ask that you carefully consider the proposed regulations in light of these and other public comments, with particular attention paid to the classification process, the need to provide at least minimal protection to Class 4 streams and the importance of including within the regulations a specific avenue for improving stream ecology.

CVTU often has to highlight the critical nature of our water resources when we make public comment. At this time in Connecticut however, we believe that everyone recognizes the need to manage the flow and availability of water. The proposal you are making to revise stream flow standards is creative and balanced. CVTU supports your efforts.

Yours truly,

A handwritten signature in cursive script, appearing to read "Doug Peterson".

Doug Peterson  
VP Grants and Government Relations